


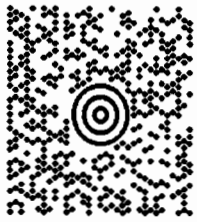
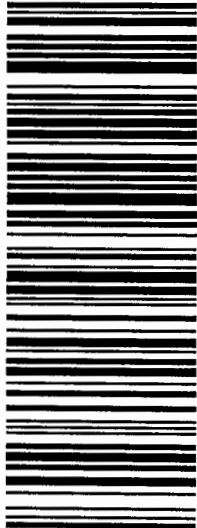

UPS CampusShip: View/Print Label

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed sheet containing the label at the line so that the entire shipping label is visible. Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**
UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.
Find your closest UPS location at: www.ups.com/dropoff
Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Customers with a Daily Pickup

Your driver will pickup your shipment(s) as usual.

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LILLIAN ANDRELCZYK 215-814-2081 US EPA 1650 ARCH ST PHILADELPHIA PA 19103	1.0 LBS LTR 1 OF 1	SHIP TO: RUSSELL DEPPE, WASTE ENFORC MANAGER VIRGINIA DEPT. OF ENVIRONMENTAL QUALITY P.O. BOX 1105 RICHMOND VA 23218-1084	VA 232 9-50  	UPS NEXT DAY AIR SAVER 1P TRACKING #: 1Z A43 F71 13 9158 4869		BILLING: P/P	 Reference # 1: Debbie Moody 215 814-3294 CS 14.5.29. VNTJ70 30.0A 07/2012
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

AUG 07 2012

VIA UPS

Russell Deppe
Waste Enforcement Manager
Virginia Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218-1105

Re: FCC Environmental LLC Facility

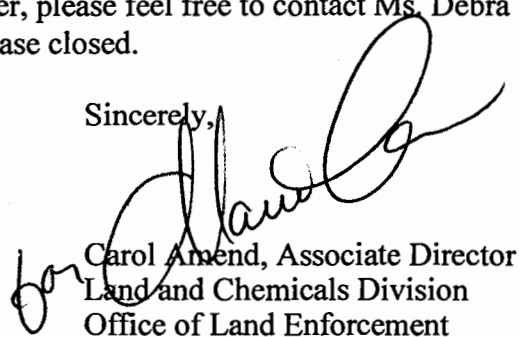
Dear Mr. Deppe:

On April 18, 2012, the U.S. Environmental Protection Agency, Region III ("EPA") conducted a Compliance Evaluation Inspection ("CEI") of FCC Environmental LLC ("Facility") located in Alexandria, Virginia under the Virginia Hazardous Waste Management Regulations 9 VAC 20-60 and the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. Sections 6901 et seq.

During EPA's monthly conference call on July 26, 2012, EPA advised Virginia Department of the Environmental Quality (VADEQ) that 90 percent of the violations identified in the inspection report dated April 25, 2012, were Used Oil violations, which EPA is not authorized to enforce. As agreed upon, VADEQ will follow-up on all of the violation. A copy of the CEI report documenting the findings of the inspector and attachments are enclosed for your information.

If you have any questions regarding this matter, please feel free to contact Ms. Debra Moody at (215) 814-3294. EPA now considers this case closed.

Sincerely,


Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Enclosure(s)

cc: R. Deppe (VADEQ)
D. Moody (3LC70) ✓

ROUTING AND TRANSMITTAL SLIP				Date: 8/2/2012
TO: (Name, office symbol, room number, building, Agency/Post)			Initials	Date
1 D. Moody, 3LC70			Jen	8/2/12
2. K. Cox, 3LC70			KAC	8/2/12
3. C. Amend, 3LC70			CA	8/2/12
4				
5.				
6.				
	Action		File	Note and Return
x	Approval		For Clearance	Per Lan Message
	As Requested		For Correction	Prepare Reply
	Circulate (if needed)		For Your Information	See Me
	Comment		Investigate	X Signature
	Coordination		Justify	SEE REMARKS
REMARKS : FCC Environmental LLC – Cover Letter <div style="font-family: cursive; font-size: 1.2em; margin-top: 10px;"> Debra - Please take care of marketing I sent! </div> <p style="text-align: center; margin-top: 10px;">use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions</p>				
FROM: (Name, org. Symbol, Agency/Post)			Room No. -- Bldg 3LC70	
Debra Moody			Phone No. 4-3294	

5041-103

UNICOR FPI - SST

OPTIONAL FORM 41 (Rev 1-94)

Prescribed by GSA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

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Waste Enforcement Manager
Virginia Department of Environmental Quality
P.O. Box 1105
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Carol Amend, Associate Director
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Office of Land Enforcement

Enclosure(s)

cc: R. Deppe (VADEQ)
D. Moody (3LC70)

CONCURRENCES							
SYMBOL ▶	3LC70	3LC70	3LC70				
SURNAME	D. Moody	K. Cox	C. Amend				
DATE ▶	8/2/12	8/2/12	8/2/12				

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY



RCRA COMPLIANCE AND ENFORCEMENT BRANCH
ENFORCEMENT CASE RECOMMENDATION
WORKSHEET¹

EPA ID NUMBER: VAD980537302

FACILITY NAME: FCC Environmental, LLC

CASE REVIEW OFFICER: Debra Moody

REVIEW START DATE: 06/2012

FINDINGS OF INITIAL CASE REVIEW:

- a. After reviewing the inspection report the inspector noted that the Facility failed to update their Contingency Plan, Failed to label and date Universal Waste Lamps and the remaining 90% of the violations were for Used Oil

DISPOSITION RECOMMENDATION: JUD REF APO AO NOV 3013 7003 CLOSE **OTHER** /NOD

JUSTIFICATION FOR RECOMMENDATION: During EPA's monthly conference call on July 26, 2012, EPA advised Virginia Department of the Environmental Quality (VADEQ) that 90 percent of the violations identified in the inspection report dated April 25, 2012, were Used Oil violations, which EPA is not authorized to enforce. As agreed upon, VADEQ will follow-up on **all** of the violation. A copy of the CEI report documenting the findings of the inspector and attachments was sent to VADEQ on 8/7/12.

CONCURRENCE SECTION

CASE REVIEW OFFICER Debra Moody

DATE: 8/8/12

Ken Cox *[Signature]*

DATE: 8/10/12

ASSOCIATE DIRECTOR
LAND AND CHEMICALS DIVISION

[Signature]
Carol Amend

DATE: 8/10/12

- (A) Inspection Report dated April 25, 2012
- (B) Correspondence
- (C) Briefing Letter to VADEQ

¹ This is a pre-decisional document protected by the deliberative process and attorney work product privileges (and may also be privileged attorney-client communication). Conclusions or recommendations are intended solely as primary information for government personnel. This worksheet contains tentative conclusions and staff-level recommendations and does not create any rights, or procedural, or defenses, as they are not binding on the Agency or the Department of Justice.